

Document Title: Draft Remedial Investigation Report for Lower Ley Creek Subsite of the Onondaga Lake Superfund Site
Version: Draft – March 2013

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	1.	Please see the previous comments on the Draft Remedial Alternatives Technical Memorandum, and incorporate them into the revised RI, as appropriate.	NA	NA	The previous comments on the Draft Remedial Alternatives Technical Memorandum have been incorporated into the revised RI.
	2.	The text states that BNAs were detected in the surface water samples below NYSDEC water quality standards, and then appears to contradict itself by stating that BNAs were detected above NYSDEC water quality standards. Please clarify.	Executive Summary	ES-1 4 th Paragraph	The fifth paragraph on Page ES-1 now reads, “Metals, volatile organic compounds (VOC), and base/neutral/acid organic compounds (BNA) were detected in the surface water samples. All metals and VOCs were detected below New York State Department of Environmental Conservation (NYSDEC) Water Quality Standards. BNAs were detected at or above NYSDEC Water Quality Standards at several surface water sample locations.”
	3.	PCBs should be discussed separately from BNAs.	Executive Summary	ES-1 4 th Paragraph	PCBs are now discussed separately from BNAs in the surface water sample discussions.
	4.	Text discussing the Old Ley Creek Channel should be added.	Executive Summary	ES-2	Text discussing the Old Ley Creek Channel has been added to the Executive Summary (full Paragraphs 4 and 5 on Page ES-2)
	5.	Based on the data and site history, the Town of Salina Landfill does not appear to have been a "major" source of PCBs to Lower Ley Creek in the same manner as the former GM-IFG facility. The text, "and the Town of Salina Landfill" should be deleted, and "sources" should be modified to "source".	Executive Summary	ES-2 1 st Full Paragraph	This paragraph has been modified to delete the reference to the Town of Salina Landfill.
	6.	The last sentence of the paragraph indicates that ongoing discharges to Onondaga Lake via Lower Ley Creek may be transporting PCBs to the Lake. This sentence should be deleted or modified. Based on recent surface water data and sediment data, PCB migration to Onondaga Lake is minimal, and not significant enough to impact the Lake remedy.	Executive Summary	ES-2 1 st Full Paragraph	The sentence has been deleted from the paragraph addressed in Comment Response 5.

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	7.	The locations of the HHRA and the BERA should be stated in the text [e.g., HHRA (Appendix E)].	Executive Summary	ES-2 2 nd Full Paragraph	The locations of the HHRA and the BERA have been added to the text (Appendices G and H, respectively).
	8.	A sentence should be added which states that Murphy's Island, an area which is culturally important to the Onondaga Nation, is located adjacent to the mouth of Lower Ley Creek.	1.2.1	1-1	The following sentence has been added to this section, "Murphy's Island, an area which is culturally important to the Onondaga Nation, is located adjacent to the mouth of Lower Ley Creek."
	9.	The text discusses "GM - Old Ley Creek Channel Site". The Old Ley Creek Channel is part of the Lower Ley Creek Site, and should probably not be referred to as a separate site to avoid confusion to the reader.	1.2.2	1-2 4 th Paragraph	The reference to the "GM – Old Ley Creek Channel Site" has been removed from this paragraph.
	10.	The entire section of the landfill south of Lower Ley Creek with PCBs less than 50 ppm was relocated north of Lower -Ley Creek in 2011. Material with 50 ppm PCBs or greater was properly disposed of in an off-site TSCA landfill. Except for a 50-foot section in the southeast corner of the relocation effort, this landfill excavation did not intersect with Lower Ley Creek or the Old Ley Creek Channel. The 50-foot section which did intersect with Lower Ley Creek and/or the Old Ley Creek Channel contained soils and sediment-with PCB concentrations less than 50 ppm and are capped under the Completed section of Town of Salina Landfill closure system. The section should be modified to incorporate this comment.	1.2.4	1-4	The section has been modified to incorporate this comment.

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	11.	PCB contaminated soil with concentrations greater than 50 ppm and up to 333 ppm were excavated and shipped off-site to a TSCA landfill. Soils with less than 50 ppm PCBs were placed on the north side of Lower Ley Creek on the Town of Salina Landfill, and were capped in 2012. Generally speaking, PCB-contaminated material with concentrations greater than 1 ppm was removed from the 4 acres south of Ley Creek during the consolidation effort. This section should be modified to incorporate this comment.	1.2.4	1-4	This section has been modified to incorporate this comment.
	12.	This section should also include a description of field activities conducted for the Old Ley Creek Channel area.	2.2	2-2	A description of the field activities conducted for the Old Ley Creek Channel has been added to Section 2.2.6.
	13.	This section should also incorporate the physical characteristics of the Old Ley Creek Channel area.	3.0	3-1	The physical characteristics of the Old Ley Creek Channel site have been added to Sections 3.1, 3.2, 3.4, and 3.7.
	14.	Source documents referring to the historic and current fish population within Onondaga Lake should be cited. The primary focus of this section should be Ley Creek. In addition, the fish sampling performed in 2009 as part of this study should also be mentioned.	3.8	3-3	The source document for the historic and current fish population within Onondaga Lake is the Lockheed Martin SERAS <i>Field Activities Summary Report, Lower Ley Creek Superfund Site</i> (SERAS, 2012). It has been cited in Section 3.8. We have also included information on the Lower Ley Creek fish sampling conducted in 2009.
	15.	The Old Ley Creek Channel data should also be incorporated into this section.	4.0	4-1	Old Ley Creek Channel data has been incorporated into Section 4.2.
	16.	PCB results should be discussed.	4.2	4-1	PCBs are now discussed in this section.
	17.	The total organic carbon (TOC) value used to calculate sediment criteria should be indicated.	4.5	4-3 & 4-4	The total organic carbon (TOC) value used to calculate sediment criteria has been incorporated into Section 4.1.5.
	18.	The Old Ley Creek Channel data should also be incorporated into this section.	5.0	5-1	Old Ley Creek Channel data has been incorporated into Section 5, Tables 5.1a-e, Tables 5.2a-e, and Section 5 Figures.

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	19.	Please discuss the role that leachate/contaminated groundwater from the Salina Landfill plays(ed) in the contamination of Lower Ley Creek. It may be helpful to review the remedy for the Salina Landfill site and the design for the leachate collection trench. In addition, the erosion (and deposition) potential along the Creek should be analyzed.	6.0	6-1	A discussion of the role that leachate/contaminated groundwater from the Salina Landfill did play and plays in the contamination of Lower Ley Creek has been added to Section 6.1.1. In addition, the erosion and deposition potential along Lower Ley Creek has been addressed in Section 6.2.3.
	20.	The paragraph should be deleted. Based upon the data, it does not appear that Ley Creek is currently a significant source of contamination to Onondaga Lake (i.e., current loading will not impact the Lake remedy).	6.4	6-2 & 6-3	This paragraph has been deleted.
	21.	The text, "the Town of Salina Landfill" should be deleted.	6.5	6-3 3 rd Bullet	This text has been deleted.
	22.	The 4th bullet should be deleted. Generally speaking, the contaminate concentrations decrease from the upper portions of Lower Ley Creek to the lower portions of Lower Ley Creek (see 5th bullet).	6.5	6-3 4 th Bullet	This bullet has been deleted.
	23.	The last bullet should be deleted or modified. While low levels of contaminants may be being transported to Onondaga Lake, the concentrations or mass loadings are not expected to impact the Lake remedy.	6.5	6-3 Last Bullet	This bullet has been deleted.
	24.	Please update the RAOs per the technical memo comments.	9.2	9-2	The RAOs have been updated per the comments in the Draft Remedial Alternatives Technical Memorandum (See Section 9.2).
	25.	The figures should be updated per the April 10, 2013 list of figures.	Figures		The figures have been updated per the April 10, 2013 list of figures.
	26.	All figures should say "non detect" instead of "Other soil sample location".	Figures		The figures have been modified to make it clear at what locations non-detects were reported.

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	27.	Please include the Old Ley Creek Channel data.	Appendices		The Old Ley Creek Channel Data and RI Report have been added as Appendix D.